

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

Yunseo CHUNG,

Plaintiff-Petitioner,

v.

Case No. 25-cv-2412

Donald J. TRUMP, in his official capacity as President of the United States of America; Marco RUBIO, in his official capacity as Secretary of State, U.S. Department of State; Pamela BONDI, in her official capacity as Attorney General, U.S. Department of Justice; Kristi NOEM, in her official capacity as Secretary of Homeland Security, U.S. Department of Homeland Security; Todd M. LYONS, in his official capacity as Acting Director, U.S. Immigration and Customs Enforcement; and William P. JOYCE, in his official capacity as Acting Field Office Director of the New York Immigration and Customs Enforcement Office,

Defendants-Respondents.

[PROPOSED] TEMPORARY RESTRAINING ORDER

Pursuant to Fed. R. Civ. P. 65, and having reviewed Plaintiff-Petitioner's Proposed Order to Show Cause for a Temporary Restraining Order and Preliminary Injunction, Plaintiff-Petitioner's supporting Memorandum of Law with attached declarations and exhibits, and any response thereto, the Court HEREBY ORDERS that:

- 1) Plaintiff-Petitioner's Motion for a Temporary Restraining Order and/or Preliminary Injunction is granted because Plaintiff-Petitioner has demonstrated that she will suffer irreparable harm if this Court does not issue relief; that she is substantially likely to prevail on her claims that Defendants-Respondents' actions to arrest, detain, and transfer Plaintiff-Petitioner violate the First Amendment, the Due Process Clause of the

Fifth Amendment, and the INA; that the balance of equities and public interest tip in favor of a temporary restraining order; and that a preliminary injunction is an appropriate and necessary remedy;

- 2) Defendants-Respondents are enjoined from detaining the Plaintiff-Petitioner pending further order of this Court;
- 3) Defendants-Respondents are enjoined from transferring the Plaintiff-Petitioner from the jurisdiction of this District pending further order of this Court;
- 4) Should Defendants-Respondents seek to detain Plaintiff-Petitioner on any asserted basis other than pursuing her removal under 8 U.S.C. § 1227(a)(4)(C) pending the Court's decision on a preliminary injunction, Defendants-Respondents are ordered to provide sufficient advance notice to the Court and counsel, in order to enable Plaintiff-Petitioner an opportunity to be heard regarding whether any such asserted basis for detention constitutes a pretext for First Amendment retaliation; and
- 5) The bond requirement of Federal Rule of Civil Procedure 65(c) is waived.

IT IS SO ORDERED.

Dated: _____, 2025
New York, New York

United States District Judge